

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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YANG FENG ZHAO,

Plaintiff,

-against-

CITY OF NEW YORK, DETECTIVE NGA CHEUNG
NG, DETECTIVE BILLY MILAN, SGT. BRIAN
CONLON and "JOHN DOE #2,"

Defendants...

----- X

**DECLARATION OF
AFSAAN SALEEM IN
SUPPORT OF DEFENDANTS'
RULE 72 MOTION**

07 CV 3636 (LAK)(MHD)

AFSAAN SALEEM, declares under penalty of perjury and pursuant to 28 U.S.C.

§ 1746 that the following statements are true and correct.

1. I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants the City of New York, Detective Nga Cheung Ng, Detective Billy Milan and Sgt. Brian Conlon. As such, I am familiar with the facts stated below and, as well, submit this declaration to place relevant documents on the record in support of defendants' motion pursuant to the Federal Rules of Civil Procedure Rule 72, objecting to the Order of the Magistrate judge, dated July 24, 2008.

2. Attached as Exhibit "A" is a copy of Order of the Honorable Michael H. Dolinger, dated July 24, 2008, denying Defendants' application to compel a medical examination.

3. Attached as Exhibit "B" is a copy of the Amended Complaint filed by plaintiff on or about April 28, 2008.

4. Attached as Exhibit "C" is a copy of the August 26, 2007 report of Deborah Davis, Ph.D., plaintiff's psychological expert in the above-referenced matter.

5. Attached as Exhibit "D" is a copy of the June 9, 2008 supplemental report of Deborah Davis, Ph.D. plaintiff's psychological expert in the above-referenced matter.

6. Attached as Exhibit "E" is a copy of the report of defendants' medical expert, Dr. Paul Nassar.

Dated: New York, New York
August 8, 2008

MICHAEL A. CARDOZO
Corporation Counsel
Attorney for Defendants
100 Church Street
New York, New York 10007
(212) 788-9580

By: /s/
Afsaan Saleem (AS 2012)
Senior Counsel
Special Federal Litigation Division

To: Siegle & Sims
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New York, NY 10007

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MICHAEL A. CARDOZO

Corporation Counsel of the City of New York
Attorney for Defendants City of New York, Ng,
Milan and Conlon
100 Church Street
New York, N.Y. 10007

Of Counsel: Afsaan Saleem
Tel: (212) 788-9580
NYCLIS No.

Due and timely service is hereby admitted.

New York, N.Y., 200.....

..... Esq.

Attorney for.....